

## **REMARKS**

In view of the above amendments and the following remarks, reconsideration and further examination are respectfully requested.

### **I. Amendments to the Specification and Abstract**

The specification and abstract have been reviewed and revised to improve their English grammar. The amendments to the specification and abstract have been incorporated into a substitute specification and abstract. Attached are two versions of the substitute specification and abstract, a marked-up version showing the revisions, as well as a clean version. No new matter has been added.

### **II. Amendments to the Claims**

Claims 20 and 22 have been cancelled without prejudice or disclaimer of the subject matter contained therein.

Further, independent claims 15, 28 and 29 have been amended to clarify features of the invention recited therein and to further distinguish the present invention from the references relied upon in the rejections discussed below.

It is also noted that claims 15-19, 21, 23, 24, 28 and 29 have been amended to make a number of editorial revisions thereto. These editorial revisions have been made to place the claims in better U.S. form. Further, these editorial revisions have not been made to narrow the scope of protection of the claims, or to address issues related to patentability, and therefore, these

amendments should not be construed as limiting the scope of equivalents of the claimed features offered by the Doctrine of Equivalents.

### **III. 35 U.S.C. § 102 Rejection**

Claims 15-23, 28 and 29 were rejected under 35 U.S.C. §102(e) as being anticipated by Twiss (U.S. 2006/0168318). This rejection is believed clearly inapplicable to amended independent claims 15, 28 and 29 for the following reasons.

Independent claim 15 recites an apparatus including an identifier generation unit operable to generate an identifier that includes (i) information identifying a chronological order in which a file is created and (ii) information identifying hardware that creates the file. Further, claim 15 recites a calculation unit operable to calculate a hash value (used for generating a file name) of the generated identifier by (i) dividing the identifier into a plurality of blocks, each block having N bytes (N being a number of alpha-numeric characters that are usable for the file name of the file), (ii) calculating an arithmetic operation value having N bytes by performing a predetermined arithmetic operation on the plurality of blocks, and (iii) setting the hash value represented by the N alpha-numeric characters to a remainder calculated by dividing the arithmetic operation value by a predetermined value. Twiss fails to disclose or suggest the above-mentioned distinguishing features as recited in independent claim 15.

Rather, Twiss merely teaches that a cache ID is associated with a file name and with a hash value that is to be retrieved with a file associated with the file name (see paragraphs [0032] and [0070]).

Thus, in view of the above, it is clear that Twiss merely teaches that a hash value is associated with a file name and a cache ID, but fails to disclose or suggest calculating a hash value of the generated identifier by (i) dividing the identifier into a plurality of blocks, each block having N bytes, (ii) calculating an arithmetic operation value having N bytes by performing a predetermined arithmetic operation on the plurality of blocks, and (iii) setting the hash value represented by the N alpha-numeric characters to a remainder calculated by dividing the arithmetic operation value by a predetermined value, as required by claim 15.

Therefore, because of the above-mentioned distinctions it is believed clear that independent claim 15 and claims 16-19, 21, 23 and 24 that depend therefrom are not anticipated by Twiss.

Please note that a result of the structure required by claim 15 is that the identifier is divided into blocks prior to the calculation of the hash value, which results in a reduced calculation load compared to calculating hash values using non-divided data. In light of the discussion above, it is clear that Twiss does not provide the above-mentioned benefits of the structure required by claim 15, because Twiss merely teaches that a hash value is associate with a file name. In other words, Twiss teaches that a hash value is calculated, but does not provide the benefit of reducing the calculation load, as discussed above regarding claim 15.

Furthermore, there is no disclosure or suggestion in Twiss or elsewhere in the prior art of record which would have caused a person of ordinary skill in the art to modify Twiss to obtain the invention of independent claim 15. Accordingly, it is respectfully submitted that independent claim 15 and claims 16-19, 21, 23 and 24 that depend therefrom are clearly allowable over the prior art of record.

Amended independent claims 28 and 29 are directed to a method and a program, respectively and each recite features that correspond to the above-mentioned distinguishing features of independent claim 15. Thus, for the same reasons discussed above, it is respectfully submitted that claims 28 and 29 are allowable over Twiss.

#### **IV. 35 U.S.C. § 103(a) Rejection**

Claim 24 was rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Twiss and Ogikuba (U.S. 2005/0243190).

It is respectfully submitted that Ogikuba does not disclose or suggest the above-discussed features of independent claim 15 which are lacking from Twiss. Therefore, no obvious combination of Twiss with Ogikuba would result in, or otherwise render obvious, the invention recited independent claim 15 and the claims that depend therefrom.

**V. Conclusion**

In view of the above amendments and remarks, it is submitted that the present application is now in condition for allowance and an early notification thereof is earnestly requested. The Examiner is invited to contact the undersigned by telephone to resolve any remaining issues.

Respectfully submitted,

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